

Patrick Morrissey

From: Samuel D. Branum <branums@jbltd.com>
Sent: Monday, August 7, 2023 4:52 PM
To: Patrick Morrissey; Thomas Morrissey
Cc: Brian P. Gainer; Monica Burkoth; Aleeza Mian
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

I told you we cannot add an inspection of the Cermak ramp to August th and still be in compliance with Judge Gilbert's order. I told you if you wanted to inspect the Cermak ramp on August th, then you need to seek leave of court from Judge Gilbert to have him carve out time from his order to include an inspection of the Cermak ramp on that day.

I don't know how else to say this, so I apologize if it comes across as harsh, but I don't think you know the meaning of the word "agreement" because nothing in what we discussed could be construed as the parties reaching an agreement on this issue. This was the same issue that came up before Judge Kennelly in the *Bailey* case where you said the parties reached an agreement but Judge Kennelly found otherwise.

From: Patrick Morrissey <pwm@morrisseylawchicago.com>
Sent: Monday, August 7, 2023 4:34 PM
To: Samuel D. Branum <branums@jbltd.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

Sam:

You told us defendants' only concern is being held in contempt by Judge Gilbert. We agreed that all 4 ramps will be inspection within the time period allowed by Judge Gilbert.

Please make your changes to the status report so we can e-mail it by the close of business.

Pat Morrissey

From: Samuel D. Branum <branums@jbltd.com>
Sent: Monday, August 7, 2023 4:29 PM
To: Patrick Morrissey <pwm@morrisseylawchicago.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

What "agreement" are you referring to? We did not reach any agreement on our phone call.

From: Patrick Morrissey <pwm@morrisseylawchicago.com>
Sent: Monday, August 7, 2023 4:23 PM
To: Samuel D. Branum <branums@jbltd.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

Attached are our edits.

Pat Morrissey

From: Samuel D. Branum <branums@jbltd.com>
Sent: Monday, August 7, 2023 4:03 PM
To: Patrick Morrissey <pwm@morrisseylawchicago.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

Attached is Defendants' position. If you have no further edits, you have my consent to email to Judge Cummings.

From: Patrick Morrissey <pwm@morrisseylawchicago.com>
Sent: Monday, August 7, 2023 3:36 PM
To: Samuel D. Branum <branums@jbltd.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: RE: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

Sam:

Attached is a draft of the status report due today.

Pat Morrissey

From: Samuel D. Branum <branums@jbltd.com>
Sent: Monday, August 7, 2023 2:28 PM
To: Patrick Morrissey <pwm@morrisseylawchicago.com>; Thomas Morrissey <tgm@morrisseylawchicago.com>
Cc: Brian P. Gainer <gainerb@jbltd.com>; Monica Burkoth <burkothm@jbltd.com>; Aleeza Mian <miana@jbltd.com>
Subject: Walker v. Dart et al., 20-cv-261 - Inspection of Cermak Ramp

Counsel,

In *Westmoreland*, Judge Gilbert ordered the Sheriff's Office "to allow Plaintiff's counsel and architectural expert up to 4 hours for the inspection of the ramps in question, not including interruptions of the inspection that may occur because of security needs of the Cook County Jail. If the inspection cannot be completed in 4 hours, then Defendant Dart is ordered to permit Plaintiff's counsel and Plaintiff's architect to finish their inspection within a week after the first inspection."

Based on Judge Gilbert's order, the parties scheduled the inspection from 12pm-5pm, which includes 4 hours for the ramp inspection plus travel time, interruptions, security needs, etc.

The Sheriff's Office will not risk being held in contempt for not being able to comply with Judge Gilbert's order because another inspection was added to the itinerary for that day.

If you would like to add another ramp inspection to the itinerary, you will need to seek leave from Judge Gilbert to modify his order to fit in an additional inspection.

Thank you,
Sam

Samuel D. Branum, Attorney at Law



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